



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE

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**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
ENFORCEMENT ACTION - ORDER BY CONSENT
ISSUED TO
FORK UNION MILITARY ACADEMY
FOR
FORK UNION MILITARY ACADEMY STP
VPDES Permit No. VA0024147**

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 62.1-44.15, between the Department and Fork Union Military Academy, regarding the Fork Union Military Academy STP, for the purpose of resolving certain violations of the State Water Control Law and the applicable permit and/or regulation. This Order supersedes and terminates the Consent Order issued by the State Water Control Board to Fork Union Military Academy on December 14, 2018.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "305(b) report" means the report required by Section 305(b) of the Clean Water Act (33 United States Code § 1315(b)), and Va. Code § 62.1-44.19:5 for providing Congress and the public an accurate and comprehensive assessment of the quality of State surface waters.

2. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia, as described in Va. Code § 10.1-1183.
3. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
4. "Discharge" means discharge of a pollutant 9 VAC 25-31-10.
5. "Discharge of a pollutant" when used with reference to the requirements of the VPDES permit program means:
 - (a) Any addition of any pollutant or combination of pollutants to surface waters from any point source; or
 - (b) Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.
6. "DMR" means Discharge Monitoring Report.
7. "Effluent" means wastewater – treated or untreated – that flows out of a treatment plant, sewer, or industrial outfall.
8. "FUMA" means Fork Union Military Academy, a corporation authorized to do business in Virginia, and its affiliates, partners, and subsidiaries. FUMA is a "person" within the meaning of Va. Code § 62.1-44.3.
9. "Facility" or "Plant" means the Fork Union Military Academy sewage treatment plant located at 765 Academy Road in Fork Union, Virginia, which treats and discharges treated sewage and other wastes, from FUMA's dormitories, staff housing, dining hall, and motor lodge with restaurant under VPDES Permit No. VA0024147.
10. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 62.1-44.15.
11. "Order" means this document, also known as a "Consent Order" or "Order by Consent," a type of Special Order under the State Water Control Law.
12. "Permit" means VPDES Permit No. VA0024147, which was issued under the State Water Control Law and the Regulation to FUMA on February 1, 2018 and which expires on January 31, 2023.
13. "Pollutant" means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended (42 USC § 2011 *et seq.*)), heat, wrecked or discarded equipment, rock, sand,

cellar dirt and industrial, municipal, and agricultural waste discharged into water... 9
VAC 25-31-10.

14. "Pollution" means such alteration of the physical, chemical, or biological properties of any state waters as will or is likely to create a nuisance or render such waters (a) harmful or detrimental or injurious to the public health, safety, or welfare or to the health of animals, fish, or aquatic life; (b) unsuitable with reasonable treatment for use as present or possible future sources of public water supply; or (c) unsuitable for recreational, commercial, industrial, agricultural, or other reasonable uses, provided that (i) an alteration of the physical, chemical, or biological property of state waters or a discharge or deposit of sewage, industrial wastes or other wastes to state waters by any owner which by itself is not sufficient to cause pollution but which, in combination with such alteration of or discharge or deposit to state waters by other owners, is sufficient to cause pollution; (ii) the discharge of untreated sewage by any owner into state waters; and (iii) contributing to the contravention of standards of water quality duly established by the Board, are "pollution." Va. Code § 62.1-44.3.
15. "Regulation" means the VPDES Permit Regulation, 9 VAC 25-31-10 *et seq.*
16. "State Water Control Law" means Chapter 3.1 (§ 62.1-44.2 *et seq.*) of Title 62.1 of the Va. Code.
17. "State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands. Va. Code § 62.1-44.3.
18. "Va. Code" means the Code of Virginia (1950), as amended.
19. "VAC" means the Virginia Administrative Code.
20. "VPDES" means Virginia Pollutant Discharge Elimination System.

SECTION C: Findings of Fact and Conclusions of Law

1. FUMA owns and operates the Plant. The Permit allows FUMA to discharge treated wastewater from the Plant, to North Creek, in strict compliance with the terms and conditions of the Permit.
2. North Creek is located in the James River Basin. North Creek is listed in DEQ's 305(b) report as impaired for aquatic life. Sources of pollution are listed as Municipal Point Source Discharges. The Plant was included in the Benthic Total Maximum Daily Load (TMDL) Development for the North Creek Watershed, approved by the U.S. Environmental Protection Agency on February 4, 2015.
3. On January 3, 2018, FUMA and DEQ entered into a Consent Order to address exceedances of effluent limits for copper at the Plant. On December 14, 2018, FUMA

became subject to a superseding Consent Order (December 2018 Order). The superseding Consent Order included a schedule of compliance (Appendix A) to develop and implement a plan to ensure the Plant is capable of meeting the Permit's effluent limitations. Specifically, Item 1 of Appendix A required the completion of a copper reduction study by January 31, 2019 and Item 2 required submittal of the study recommendations to DEQ by February 28, 2019. The remainder of Appendix A contained subsequent deadlines for obtaining DEQ approval, completion of design and specifications, and completion of construction of an alternative treatment system or operations. The completion of the upgraded plant was due by December 31, 2020. The Order also provided an interim copper limit of 55 ug/L and phosphorus monitoring (no limit) during the study and construction phases.

4. On January 24, 2019, FUMA submitted the copper reduction study report (December 2018 Order, Appendix A, Item 1). The study report indicated that modifications to the existing treatment plant were necessary to reliably meet copper and phosphorus permit limits. FUMA indicated that they would continue to conduct study activities to inform process design.
5. On February 27, 2019, FUMA submitted the pilot test summary report (December 2018 Order, Appendix A, Item 2). Recommendations from the study included the addition of a tertiary chemical addition system following the sequencing batch reactor to feed aluminum or iron-based chemicals to the biological units and/or to a tertiary clarifier, with sulfide-based chemicals being fed to the tertiary clarifier. The report also recommended preparation of design modifications while continuing to pilot test other chemical combinations. FUMA also conducted a nitrification inhibition test which indicated that Remotox addition in accumulating concentrations could inhibit nitrification and supported the necessity to add a tertiary chemical addition system.
6. On February 3, 2020, DEQ staff met with FUMA representatives to discuss the Plant upgrades and cost estimates.
7. On March 13, 2020, FUMA notified DEQ that pandemic related operational changes had occurred at the school and that FUMA was pursuing funding opportunities for the Plant upgrade with Fluvanna County and USDA, as well as market options.
8. On March 24, 2020, FUMA submitted a letter notifying DEQ that it could not complete the requirements of the Plant upgrade to treat copper in accordance with the due dates in the Consent Order. Issues brought forward include cost escalation of the Plant upgrades (\$3+ million), inability to secure funding due to market factors related to the pandemic, and uncertainty related to operations at the school related to the pandemic. FUMA indicated that they would likely remain in compliance with the phosphorus quantity based permit limit at the lowest permitted flow tier (0.060 MGD) and expected flow rate (0.020 MGD). Furthermore, FUMA planned to address copper through continued chemical addition at the Plant and to undertake a Water-Effect Ratio (WER) study to define the multiplier used in permit limit calculation. If the WER multiplier was sufficiently high, a permit modification would be requested to adjust the copper permit limit.

9. On April 7, 2020, DEQ approved the request to undertake a WER study.
10. On June 2, 2020, FUMA submitted to DEQ for review the WER Study Plan.
11. On June 23, 2020, DEQ approved the WER Study Plan.
12. On August 27, 2020, FUMA notified DEQ that the WER study had commenced.
13. On December 31, 2020, the interim effluent limits and monitoring requirements for copper and phosphorus established in the December 2018 Order expired. The Permit established limits of 15 ug/L for copper (concentration maximum and average) and 0.185 kg/D for phosphorus (quantity average) became effective.
14. In submitting its DMRs, as required by the Permit, FUMA has indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the monthly monitoring periods of January 2021, February 2021, March 2021 and April 2021 that included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
January 2021	002	203-Copper, Total Recoverable	Concentration Maximum	39.6 ug/L	15 ug/L
January 2021	002	203-Copper, Total Recoverable	Concentration Average	39.6 ug/L	15 ug/L
January 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.193 kg/D	0.185 kg/D
February 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.25 kg/D	0.185 kg/D
February 2021	002	203-Copper, Total Recoverable	Concentration Maximum	20.6 ug/L	15 ug/L
February 2021	002	203-Copper, Total Recoverable	Concentration Average	20.6 ug/L	15 ug/L
March 2021	002	203-Copper, Total Recoverable	Concentration Maximum	18.2 ug/L	15 ug/L
March 2021	002	203-Copper, Total Recoverable	Concentration Average	18.2 ug/L	15 ug/L
April 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.263 kg/D	0.185 kg/D

15. On May 25, 2021, FUMA submitted to DEQ for review the final copper WER report. The report recommended a WER of >9.1.
16. In submitting its DMRs, as required by the Permit, FUMA indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the monthly monitoring periods of May 2021, and July 2021 that included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
May 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.263 kg/D	0.185 kg/D
July 2021	002	203-Copper, Total Recoverable	Concentration Maximum	30.6 ug/L	15 ug/L
July 2021	002	203-Copper, Total Recoverable	Concentration Average	30.6 ug/L	15 ug/L

17. On August 11, 2021, DEQ approved the final copper WER report and which included a WER of 9.1 for copper to the specific discharge conditions at the Plant site. The WER was used to adjust the Virginia acute and chronic criteria to establish an instream concentration value for copper and calculate the resulting waste load allocations and will be used to make permit decisions for the need of copper discharge limits for the Permit.

18. In submitting its DMRs, as required by the Permit, FUMA indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the monthly monitoring periods of August 2021, September 2021, and October 2021 that included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
August 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.191 kg/D	0.185 kg/D
August 2021	002	203-Copper, Total Recoverable	Concentration Maximum	18.9 ug/L	15 ug/L
August 2021	002	203-Copper, Total Recoverable	Concentration Average	18.9 ug/L	15 ug/L
August 2021	002	312-Ammonia, as N Jun-Nov	Concentration Maximum	30.8 mg/L	6.1 mg/L
August 2021	002	312-Ammonia, as N Jun-Nov	Concentration Average	12.8 mg/L	4.1 mg/L
September 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.527 kg/D	0.185 kg/D
September 2021	002	203-Copper, Total Recoverable	Concentration Maximum	34.1 ug/L	15 ug/L
September 2021	002	203-Copper, Total Recoverable	Concentration Average	34.1 ug/L	15 ug/L
October 2021	002	203-Copper, Total Recoverable	Concentration Maximum	28.3	15 ug/L
October 2021	002	203-Copper, Total Recoverable	Concentration Average	28.3	15 ug/L
October 2021	002	312-Ammonia, as N Jun-Nov	Concentration Maximum	23.3	6.1 mg/L
October 2021	002	312-Ammonia, as N Jun-Nov	Concentration Average	4.9	4.1 mg/L
October 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.705	0.185 kg/D

19. On September 13, 2021, FUMA requested a Permit modification to use the approved WER in the calculation of the permit limit for copper.

20. In submitting its DMRs, as required by the Permit, FUMA indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the monthly monitoring periods of November 2021, and December 2021 that included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
November 2021	002	012-Phosphorus, Total (as P)	Quantity Average	0.446 kg/D	0.185 kg/D
November 2021	002	203-Copper, Total Recoverable	Concentration Maximum	30.4 ug/L	15 ug/L
November 2021	002	203-Copper, Total Recoverable	Concentration Average	30.4 ug/L	15 ug/L
December 2021	002	203-Copper, Total Recoverable	Concentration Maximum	26.5 ug/L	15 ug/L
December 2021	002	203-Copper, Total Recoverable	Concentration Average	26.5 ug/L	15 ug/L

21. On January 14, 2022, DEQ and FUMA representatives had a conference call to discuss the status of the permit modification, the December 2018 Order, and next steps regarding a definitive plan and schedule to address phosphorus and ammonia violations at the Plant.
22. On March 14, 2022, DEQ issued the Permit modification. The modified Permit does not contain an effluent limitation for copper.
23. On February 18, 2022, DEQ and FUMA representatives had a conference call to discuss a plan and schedule to address phosphorus and ammonia violations at the Plant.

24. On March 29, 2022, FUMA submitted to DEQ a Plant upgrade conceptual plan that included Plant upgrades to address total phosphorus removal, future ammonia criteria applicability, past Plant overflows issues, and potential future transfer of the Plant to Fluvanna County. The proposed Plant upgrades include conversion of the sequencing batch reactors to parallel activated sludge, anoxic/aerobic continuous flow system, improved anoxic mixing, improved aeration (new blowers, DO probes, control systems), upgraded return activated sludge piping, tank segmentation, new total phosphorus coagulation tanks, and new membrane bioreactor trains. The Plant will be designed to a design average flow of 100,000 gallons per day.
25. On May 4, 2022, FUMA submitted a proposed plan and schedule for Plant upgrades. FUMA proposed utilizing a design-build approach.
26. Va. Code § 62.1-44.5 states that: “[E]xcept in compliance with a certificate issued by the Board, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances.”
27. The Regulation, at 9 VAC 25-31-50, also states that except in compliance with a VPDES permit, or another permit issued by the Board, it is unlawful to discharge into state waters sewage, industrial wastes or other wastes.
28. Va. Code § 62.1-44.31 states in part that: “It shall be unlawful for any owner to fail to comply with any special order adopted by the Board, which has become final under the provisions of this chapter...”
29. Va. Code § 62.1-44.15(5a) states that a VPDES permit is a “certificate” under the statute.
30. The Department has issued no permits or certificates to FUMA for wastewater discharges other than VPDES Permit No. VA0024147.
31. North Creek is a surface water located wholly within the Commonwealth and is a “state water” under State Water Control Law.
32. Based on the documentation and correspondence submitted by FUMA and a file review by DEQ staff, and the results of the monthly DMR submittals from January 2021, February 2021, March 2021, April 2021, May 2021, July 2021, August 2021, September 2021, October 2021, November 2021, and December 2021, the Department concludes that FUMA has violated the Permit and/or Va. Code § 62.1-44.5, Va. Code § 62.1-44.31, and 9 VAC 25-31-50.
33. DEQ issued a modified Permit on March 14, 2022 which does not include copper effluent limitations and verified that the violations as described in paragraphs C(3) through C(32) related to copper, above, have been corrected.
34. In order for FUMA to complete its return to compliance, DEQ staff and representatives of FUMA have agreed to the Schedule of Compliance for Plant upgrades to address Total Phosphorus and ammonia, which is incorporated as Appendix A of this Order.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15, the Department orders FUMA, and FUMA agrees to:

1. Perform the actions described in Appendices A and B of this Order; and
2. Pay a civil charge of \$9,200 within 30 days of the effective date of the Order in settlement of the violations cited in this Order.

Payment shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

FUMA shall include its Federal Employer Identification Number (FEIN) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department has to refer collection of moneys due under this Order to the Department of Law, FUMA shall be liable for attorneys' fees of 30% of the amount outstanding.

SECTION E: Administrative Provisions

1. The Department may modify, rewrite, or amend this Order with the consent of FUMA for good cause shown by FUMA, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.
2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Department or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, FUMA admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.
4. FUMA consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.

5. FUMA declares it has received fair and due process under the Administrative Process Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Department to modify, rewrite, amend, or enforce this Order.
6. Failure by FUMA to comply with any of the terms of this Order shall constitute a violation of an order of the Department. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Department or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. FUMA shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other unforeseeable circumstances beyond its control and not due to a lack of good faith or diligence on its part. FUMA shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. FUMA shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
 - a. the reasons for the delay or noncompliance;
 - b. the projected duration of any such delay or noncompliance;
 - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and
 - d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto and any successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and FUMA. Nevertheless, FUMA agrees to be bound by any compliance date which precedes the effective date of this Order.

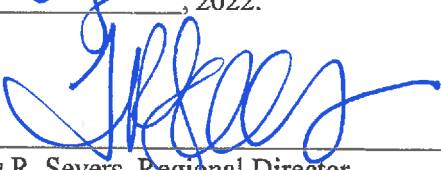
11. This Order shall continue in effect until:

- a. the Director or his designee terminates the Order after FUMA has completed all of the requirements of the Order;
- b. FUMA petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
- c. the Director or Department terminates the Order in his or its sole discretion upon 30 days' written notice to FUMA.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve FUMA from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by FUMA and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
13. The undersigned representative of FUMA certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind FUMA to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of FUMA.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.
15. By its signature below, FUMA voluntarily agrees to the issuance of this Order.

And it is so ORDERED this 27th day of July, 2022.



Tiffany R. Severs, Regional Director
Department of Environmental Quality

Fork Union Military Academy voluntarily agrees to the issuance of this Order.

Date: 5/31/22 By: Stephen Macek Chief of Staff
(Person) (Title)
Fork Union Military Academy

Commonwealth of Virginia
City/County of Florence

The foregoing document was signed and acknowledged before me this 31 day of
May, 2022, by Stephen Macek who is
Chief of Staff of Fork Union Military Academy, on behalf of the Academy.

[Signature]
Notary Public

7893673
Registration No.

My commission expires: 2/29/2024

Notary seal:

Jessica Rose Maddox
NOTARY PUBLIC
Commonwealth of Virginia
Reg. # 7893673
My Commission Expires 2/29/2024

APPENDIX A SCHEDULE OF COMPLIANCE

1. Plant Upgrades

- a. By July 1, 2022, FUMA shall prepare and submit a request for proposals for design build services to qualified firms for Plant upgrades.
- b. By October 1, 2022, FUMA shall select the preferred design build proposal.
- c. By April 1, 2023, the selected design build firm, on behalf of FUMA, shall complete the final design plans and specifications for the Plant upgrades and obtain a Certificate to Construct from DEQ as necessary.
- d. By September 30, 2024, FUMA shall complete construction of the Plant upgrades, obtain a Certificate to Operate from DEQ as necessary, and update the Plant's O&M Manual to incorporate operation and maintenance procedures.

2. General Requirements

- a. FUMA shall submit quarterly progress reports to DEQ, with the first report being due July 10, 2022. Subsequent progress reports will be due October 10, January 10, April 10 along with the Plant's Discharge Monitoring Report until the cancellation of this Order. The quarterly progress reports shall contain:
 - i) A summary of all work completed since the previous progress report in accordance with this Order;
 - ii) A projection of the work to be completed during the upcoming quarterly period in accordance with this Order; and
 - iii) A statement regarding any anticipated problems in complying with this Order.
- b. No later than 14 days following a date identified in the above schedule of compliance FUMA shall submit to DEQ a written notification of compliance or noncompliance with the scheduled item. In the case of noncompliance, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled item.

3. DEQ Contact

Unless otherwise specified in this Order, FUMA shall submit all requirements of Appendix A of this Order to:

Eric Millard
Enforcement Specialist Senior

VA DEQ –Valley Regional Office
PO Box 3000
Harrisonburg, VA 22801
Phone: 540-217-7483
Fax: 804-698-4178
eric.millard@deq.virginia.gov

APPENDIX B INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

From the effective date of this Order until completion of the corrective action requirements contained in Appendix A, but in no event later than November 30, 2024, FUMA shall monitor and limit the discharge from Outfall No. 002 of the Fork Union Military Academy STP in accordance with VPDES Permit Number VA0024147, except as specified below. These interim limits shall retroactively apply, if applicable, as of the first day of the month in which this Order becomes effective.

These requirements shall be construed in light of the Regulation.

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS	
	Monthly Average		Weekly Average	Minimum	Maximum	Frequency	Sample Type
Total Phosphorus (as P)	NL (mg/L)	NL (mg/L)	NA	NA	NA	1/Week	4-Hour Composite